

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

R. CATHY REARDON	)	
On behalf of herself and all	)	
similarly situated individuals,	)	
	)	
Plaintiffs,	)	NO. 2:08cv1730 MRH
v.	)	
CLOSETMAID CORPORATION	)	Hon. Judge Mark R. Hornak
	)	
Defendant.	)	<b>Class Action</b>

**PLAINTIFF'S QUESTIONS FOR *VOIR DIRE***

COMES NOW the Plaintiff, and hereby submits the following additional questions to be asked during *Voir Dire*:

1. Prior to this lawsuit and your involvement in this lawsuit, have any of you known or heard of the Fair Credit Reporting Act?
2. Have you known anyone who believed that they were denied a job because of a background check or consumer report?
3. Have you known anyone who was the subject of an inaccurate credit report or employee background check?
4. Are any of you philosophically, religiously or politically opposed to class actions or other damage suits, suits seeking money for consumers?
5. Have any of you ever worked in any type of position where you were responsible for hiring or firing of employees?
6. Have you or has anyone close to you ever worked at a job that required you to have

access or review credit reports or employee background checks?

7. Does anyone have any strong personal feelings regarding the use of background checks or consumer reports in our society?
8. This case involves claims arising under the Fair Credit Reporting Act that provides for punitive damages against any person who willfully fails to comply with any requirement under the act. Do any of you believe, for whatever reason, that punitive damages should never be awarded to an individual regardless of the facts?
9. You've heard that this is a class action suit; does anyone have any experience with a class action suit, either you were part of one, opted out of one, or were in some way the target of one?
10. Please raise your hand if you have a particularly negative opinion of class action lawsuits.
11. How many think that there should be a cap or limit on the amount that jury's can award in civil lawsuits?
12. Do any of you believe that punitive damages should be outlawed?
13. In spite of your own personal sympathies or philosophy, will you follow the court's instructions should the Judge allow you to consider the issue of punitive damages?
14. Is there anyone who believes that there is too much regulation of businesses?
15. Has anyone in this group ever sued anyone for any reason?
16. Has anyone in this group ever been sued by anyone for any reason?
17. Is anyone or any of your friends or family, involved with the legal system as judges, lawyers, work for lawyers or the courthouse?
18. Did any of you jurors know each other before you met today?
19. Do any of you have web sites or blogs?

20. Do any of you have personalized tags? Bumper stickers?

21. Does anyone in here not want to sit as a juror in this case for any reason whatsoever?

Respectfully submitted,

By: /s/ James M. Pietz

James M. Pietz  
Pa I.D. No. 55406  
Pietz Law Office LLC  
429 Forbes Ave., Suite 1616  
Pittsburgh, PA 15219  
412-288-4333  
E-mail: [jpietz@jpietzlaw.com](mailto:jpietz@jpietzlaw.com)

Leonard A. Bennett, Esq.  
Consumer Litigation Associates  
763 J. Clyde Morris Boulevard  
Suite 1-A  
Newport News, VA 23601  
(757) 930-3660  
E-mail: [lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)

Christopher North, Esq.  
751-A Thimble Shoals Blvd.  
Newport News, VA 23606  
(757) 873-1010  
E-mail: [cnorthlaw@aol.com](mailto:cnorthlaw@aol.com)

Counsel for the Representative And  
Class Plaintiff